

N/S/I

FEE PAID

FILED

Edwin Hamid Nahavandi  
5710 Comanche Ave.  
Woodland Hills, CA. 91367  
Telephone: (818) 569-9673  
Email: edwin.nahavandi@gmail.com

2024 MAY -7 PM 12: 05

CLERK U.S. DISTRICT COURT  
CENTRAL DIST. OF CALIF.  
LOS ANGELES

BY EEE

Plaintiff in pro per

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION

2:24-CV-03791-RGK-MRWx

EDWIN HAMID NAHAVANDI

Case No.

Plaintiff(s),

COMPLAINT

vs.

1. Violation of Title VI of the Civil  
Rights Act of 1964, 42 U.S.C. § 2000d  
et seq.

BOARD OF TRUSTEES OF THE  
CALIFORNIA STATE UNIVERSITY  
(the State of California acting in its higher  
education capacity); ERIKA DREW  
BECK, in her official capacity as President  
of California State University, Northridge;  
ZEINA OTAKY RAMIREZ, in her  
official capacity as Director of Student  
Conduct and Ethical Development at  
California State University, Northridge;  
WILLIAM WATKINS, in his official  
capacity as Vice President of Student  
Affairs at California State University,  
Northridge

2. Violation of Section 504 of the  
Rehabilitation Act of 1973, 29 U.S.C.  
§ 794 et seq.

DEMAND FOR JURY TRIAL

Defendant(s).

## INTRODUCTION

1  
2 1. This action arises out of California State University, Northridge's  
3 retaliation, discrimination, wrongful suspension and probation towards Plaintiff  
4 EDWIN HAMID NAHAVANDI, for the engagement of participating in his protected  
5 activities that were based upon his disability, race, color, and national origin, which  
6 were excluded, prevented, and deprived, personally targeting his perceived status to  
7 give him unequal, uncivil, inequitable, and biased treatment.

8 2. Action is brought under Title VI of the Civil Rights Act of 1964, 42  
9 U.S.C. § 2000d et seq, and Section 504 of the Rehabilitation Act of 1973, 29 U.S.C. §  
10 794 et seq. to prohibit CSU, Northridge from the engagement of discrimination on the  
11 basis of race, color, or national origin, and disability.

## JURISDICTION, VENUE, AND DIVISIONAL ASSIGNMENT

12  
13 3. Plaintiff brings this action pursuant to 42 U.S.C. § 2000d et seq, and 29  
14 U.S.C. § 794 et seq. Jurisdiction is conferred in this Court by 28 U.S.C. § 1331  
15 because the causes of action arise under the laws of the United States, and is pursuant  
16 to 42 U.S.C. § 2000d-7(a)(1), waiving state immunity from suit in federal court.  
17 Plaintiff is in compliance with the Government Torts Claim Act, and sought through  
18 all appropriate exhaustive and administrative measures before proceeding, allowing  
19 this Court to have full jurisdiction.

20 4. Venue is proper in this Court pursuant to 28 U.S.C § 1391 because  
21 Defendants reside in the Central District of California, and conduct business in the  
22 State of California. This action is properly assigned to the Western Division because  
23 a substantial part of the events or omissions giving rise to the claim occurred in the  
24 County of Los Angeles.

## PARTIES

25  
26 5. Plaintiff EDWIN HAMID NAHAVANDI is a Middle Eastern Jew with  
27 a learning disability who is currently under disciplinary probation in all 23 CSU  
28 campuses. Before Plaintiff was suspended from CSU, Northridge, he was receiving

1 funding by the California Department of Rehabilitation for his disability. Plaintiff at  
2 all relevant times during the events claimed in this complaint resided in Los Angeles,  
3 California.

4 6. Defendant BOARD OF TRUSTEES OF THE CALIFORNIA STATE  
5 UNIVERSITY (hereinafter "Defendant CSU") is a public entity under Cal. Gov.  
6 Code § 811.2 acting in its higher education capacity to govern all 23 CSU campuses,  
7 and is the only proper entity to be named in a suit. Defendant CSU at all relevant  
8 times during the events claimed in this complaint resided in Los Angeles, California.

9 7. Defendant ERIKA DREW BECK is sued in her official capacity as the  
10 President of California State University, Northridge. Her duties include governing  
11 and overseeing the operations of CSU, Northridge. Plaintiff believes that Defendant  
12 BECK at all relevant times during the events claimed in this complaint resided in Los  
13 Angeles, California.

14 8. Defendant ZEINA OTAKY RAMIREZ is sued in her official capacity as  
15 the Director of Student Conduct and Ethical Development at California State  
16 University, Northridge. Her duties include enforcing the CSU Student Conduct Code.  
17 Plaintiff believes that Defendant RAMIREZ at all relevant times during the events  
18 claimed in this complaint resided in Los Angeles, California.

19 9. Defendant WILLIAM WATKINS is sued in his official capacity as the  
20 Vice President of Student Affairs at California State University, Northridge. His  
21 duties include governing and overseeing CSU, Northridge's Student Affairs  
22 departments. Plaintiff believes that Defendant WATKINS at all relevant times during  
23 the events claimed in this complaint resided in Los Angeles, California.

#### 24 **STATEMENT OF FACTS**

25 10. During the beginning of the Fall 2022 semester Plaintiff EDWIN  
26 HAMID NAHAVANDI (hereinafter "Plaintiff") moved into California State  
27 University, Northridge's student housing as a resident to be closer to the University.  
28



1 During the time in which Plaintiff resided as a resident he experienced Antisemitic  
2 rhetoric and harassment from his roommates.

3 11. Eventually as time passes one of the roommates started harassing  
4 Plaintiff about his Jewish lifestyle, and became much more hostile after Plaintiff  
5 would practice his religion, which caused difficulty with the participation of his  
6 academic courses.

7 12. Plaintiff was worried, so he went to the University's Office of Student  
8 Housing and Residential Life to express his concerns about the issues he was facing,  
9 from his roommate's discrimination. The office told Plaintiff that they don't deal with  
10 matters involving such claims, and that the Plaintiff would have to sort it out by  
11 himself or request a room change.

12 13. Plaintiff went to the University's Office of the Vice President for  
13 Student Affairs (hereinafter "OVP") to discuss and report the situation, the employee  
14 at the office suggested that the Plaintiff should go to counseling, as a result of his  
15 roommate's behavior revolving Antisemitism.

16 14. Plaintiff went to the University's Office of Disability Resources and  
17 Educational Services (hereinafter "DRES") to speak about the matter, and ask about  
18 filing a discrimination report to the University's Office of Equity and Compliance  
19 (hereinafter "OEC"). The employee discouraged Plaintiff from filing a report,  
20 discussing that problems do occur between roommates, explaining how this behavior  
21 is normal for what the Plaintiff is experiencing, and recommended that he go to the  
22 University Counseling Service (hereinafter "UCS") building upstairs to talk about his  
23 situation, towards his roommate's harassment about Jews.

24 15. Plaintiff went to the UCS to talk about the situation, of his roommate's  
25 inappropriate behavior against Jewish people. The office scheduled a meeting for the  
26 Plaintiff to meet with their therapist Amy Rosenblatt. Plaintiff spoke to Dr.  
27 Rosenblatt about the situation, towards his roommate's aggressive conduct against  
28 Jewish people, discussing that he's worried and scared of his roommate. Dr.

1 Rosenblatt told Plaintiff that conflict between roommate's are normal, said to ignore  
2 the situation, and recommended that he speak to his psychologist and psychiatrist,  
3 about the Antisemitic activity that occurred towards Plaintiff from their students.

4 16. During that time the Plaintiff witnessed a group of students cheating on a  
5 psychology exam in the University using the Discord platform's live voice chat and  
6 real-time text feature to send and ask for exam answers between each other. Plaintiff  
7 was concerned, and took all the pictures he could of the chat log for evidence,  
8 sending an email with photographic evidence of the students who were cheating to  
9 the professor of that course Marc Hamer, stating that he came across a bunch of  
10 students who were cheating, explaining that some of the students who were cheating  
11 had different names to mask their identities, and why cheating is very serious.  
12 Plaintiff assured Dr. Hamer that with the evidence he provided, Dr. Hamer would  
13 know what to do.

14 17. Plaintiff forwarded the email with the photographic evidence of the  
15 students who were cheating to Defendant WILLIAM WATKINS (hereinafter  
16 "Defendant WATKINS") the University's Vice President of Student Affairs, sending  
17 a carbon copy to Dr. Hamer, stating that he wanted to bring up the issue of students  
18 cheating to Defendant WATKINS's attention, so he could be informed of the issue.  
19 Plaintiff discussed that most of the students who were cheating shared their emails  
20 before without realizing it. Plaintiff noted his Jewish affiliation, and stated that it's  
21 basically God's law to not turn a blind eye to injustices, explaining that it's a Jewish  
22 law handed by God to Moses, informing Defendant WATKINS that he's reporting  
23 this on behalf of his religious beliefs, and respect for God, stating that it's the right  
24 thing to do.

25 18. Plaintiff continued to send emails with additional photographic evidence  
26 to Dr. Hamer and Defendant WATKINS that had information of the students who  
27 were cheating, to give them all the evidence they needed to adequately complete the  
28 investigation, stating the blessings of God in Hebrew, and how they should track the



1 students IP addresses to investigate, reminding them that his report is based off his  
2 religious duty, and obligation to God, for reporting injustices, while discussing that  
3 it's God's law to not turn a blind eye.

4 19. When Plaintiff was gathering and organizing the evidence to make it  
5 easier for Defendant WATKINS and Dr. Hamer to identify which students were  
6 cheating on Dr. Hamer's exam, the Plaintiff stumbled upon a bunch of concerning  
7 comments from the students in Dr. Hamer's psychology course, discussing that Dr.  
8 Hamer doesn't take attendance, have any lecture slides or PowerPoints, nor turns on  
9 his video camera to teach his class, gives students medical diagnosis's without a full  
10 assessment, talks about things not related to the psychology course, uses profanity,  
11 talks about sexual intercourse, brags about how rich he is, while telling students to  
12 stop being poor, and become rich like him.

13 20. Plaintiff collected the evidence, and sent an email with photographic  
14 evidence of Dr. Hamer's misconduct to Defendant WATKINS, sending a carbon  
15 copy to Dr. Hamer, stating his disappointment regarding the situation, discussing how  
16 he follows his religious views, towards Judaism, and laws that God gave to Moses.

17 21. Dr. Hamer emailed Plaintiff about his cheating report, thanking him, for  
18 reporting the students who were cheating, stating that it was correct, of Plaintiff to  
19 report student conduct, and informed Plaintiff that he would speak to Jill Razani the  
20 University's Department Chair of Psychology for Social and Behavioral Sciences on  
21 how they should proceed.

22 22. Plaintiff believed that Dr. Hamer, Dr. Razani, and Defendant WATKINS  
23 would do nothing regarding the matter of misconduct in the University, so Plaintiff  
24 sent emails with photographic evidence of the students who cheated, and Dr. Hamer's  
25 misconduct to Defendant ERIKA DREW BECK (hereinafter "Defendant BECK") the  
26 President of the University, stating briefly that he wanted to inform her of the  
27 nuisances of students cheating in Dr. Hamer's psychology course, explaining the  
28 evidence of faculty misconduct he has against Dr. Hamer. Plaintiff stated that he

1 obeys the laws of God, of his Jewish religion, which God gave to Moses, discussing  
2 how he's not allowed to turn a blind eye because it goes against God, forwarding the  
3 emails he sent to Defendant BECK to Defendant WATKINS, Yan Dominic Searcy,  
4 the University's Dean for Social and Behavioral Sciences, Dr. Hamer, and the OVP.

5 23. Defendant WATKINS emailed Plaintiff in reply to his email sent to  
6 Defendant BECK, stating that he has forwarded Plaintiff's emails, which had the  
7 photographic evidence of misconduct, to Defendant ZEINA OTAKY RAMIREZ  
8 (hereinafter "Defendant RAMIREZ") the University's Director of Student Conduct  
9 and Ethical Development for investigation, and wrote that she will review his  
10 allegations, of the claim he made without proof.

11 24. Plaintiff sent an email with photographic evidence of Dr. Hamer's  
12 misconduct, as well as the students academic misconduct to the members of the  
13 University that included Defendants BECK, RAMIREZ, and WATKINS, Dr. Hamer,  
14 Dr. Razani, Dr. Searcy, OEC, and the CSU's Office of the Chancellor's Compliance  
15 department (hereinafter "CSU's Chancellor's Office") who specializes in  
16 discrimination, harassment, retaliation, and whistleblowing, kindly greeting them,  
17 explaining the situation of students cheating in Dr. Hamers course, including the  
18 professor's misconduct, discussing how it's not possible for Defendant WATKINS to  
19 tell Plaintiff that he's making an allegation of students cheating, because it was said  
20 employees of the state charge people for conduct based off factual evidence, which  
21 moves beyond an mere allegation, stating that under Title 5, California Code of  
22 Regulations, Section 41301, students are encouraged to report acts of academic  
23 dishonesty, and sincerely expressed how he abides by his religious laws to not turn a  
24 blind eye.

25 25. Robin Ferguson the Executive Assistant for Defendant WATKINS,  
26 emailed Plaintiff on behalf of the OVP to acknowledge that her office has received  
27 the Plaintiff's report of cheating he made, about Dr. Hamer's psychology course, and  
28 stated that she has forward it to a student conduct officer to address, for investigation.



1           26. Defendant WATKINS emailed Plaintiff, stating that in his last reply to  
2 him, of Plaintiff making an allegation, about students who were cheating that  
3 Defendant RAMIREZ will contact Plaintiff, for his accusation of students cheating.  
4 Defendant RAMIREZ replied that she will review and investigate Plaintiff's report,  
5 informing Plaintiff that her office will determine the outcome of the investigation,  
6 and to refrain from reporting the situation to anyone in the University.

7           27. Plaintiff went to the OVP, regarding the matter of students cheating in  
8 Dr. Hamer's psychology course, speaking to an employee about the situation, and  
9 discussed the evidence he gathered. The employee discussed that the Plaintiff isn't  
10 allowed to possess pictures of students cheating, explaining how the exam and its  
11 contents are the property of the professor, mentioning that providing evidence will  
12 result in legal trouble, and suspension or expulsion from the University. Plaintiff  
13 discussed to the employee that the exam was taken on Canvas, an online platform  
14 university professors use to assign and create quizzes or exams, and track cheating,  
15 explaining that the platform tracks user information to track cheating. The employee  
16 told Plaintiff that this wasn't possible, so Plaintiff tried explaining the situation  
17 further, and was threatened to leave or the police would be called on him for  
18 disturbance.

19           28. Plaintiff was worried that Defendant RAMIREZ and the OVP might  
20 refuse to enforce the CSU's policies, and retaliate back, so Plaintiff in an attempt to  
21 obtain witnesses posted on the University's Reddit, blogging platform service, page  
22 about the academic dishonesty and faculty misconduct he witnessed, writing about  
23 his dedication to God, expressing his Jewish religions standpoint of not turning a  
24 blind eye, and stated the blessing of God in Hebrew.

25           29. After the post was made, students in the University, including the  
26 students who were cheating in Dr. Hamer's course got ahold of the Reddit post, and  
27 wrote Antisemitic comments against Plaintiff's religion, discussing how Plaintiff is  
28 not a good person for believing in God, is a failure to God, expressing that's the



1 reason to why he's ugly and fat, while using abusive and offensive language towards  
2 Plaintiff's Jewish religion.

3 30. A student in the Discord chat showed everyone the Reddit post the  
4 Plaintiff made, and told them that someone in the Discord chat ratted them out for  
5 cheating. They made comments discussing that they were going to be fine, how their  
6 professor Dr. Hamer hasn't brought up the cheating incident since a week of  
7 Plaintiff's report, how Dr. Hamer is aware of them cheating, while ignoring the  
8 Plaintiff, how they don't mind if Dr. Hamer uses offensive or abusive language in his  
9 class, how nothing will happen to them because the CSU Chancellor, the University,  
10 Dr. Hamer, and Defendants BECK and WATKINS received the Plaintiff's report, and  
11 will not proceed any further since he would be ignored, explaining that the University  
12 was on top of deleting and concealing the evidence against them, how Plaintiff will  
13 not be taken seriously from the University, how Dr. Hamer's misconduct is actually  
14 standard behavior from professors in a University, how disrespecting a professor is  
15 not illegal or against the University's policies because students disrespect professors  
16 all the time.

17 31. The students targeted Plaintiff for his religious beliefs for reporting  
18 them, stating that the Plaintiff should get kicked out from the University, conducted  
19 harassment for reporting them, explained how Plaintiff is going to get in trouble from  
20 the University for reporting cheating against them because it's messed up, mentioning  
21 that the Plaintiff is mentally ill, somethings mentally wrong with him, needs to seek a  
22 medical professional, are unsafe knowing the Plaintiff goes to the University, are  
23 unsafe that Plaintiff wrote that he has to defend himself against retaliation from the  
24 University, how he's a threat to the safety of the University and students for reporting  
25 academic misconduct against them, expressing their intent of inflicting fear onto the  
26 Plaintiff, while laughing at the hate speech targeted towards Plaintiff's Jewish  
27 religion, and ridiculed his religious views.

1        32. The students discussed that the Plaintiff has all the evidence against  
2 them cheating, including the parts of them taking the exam together, mentioning that  
3 they can't defend themselves against the school and the Plaintiff, due to the fact that  
4 they got caught, which created a commotion of crying emojis.

5        33. The students all teamed up to initiate a lawsuit against the Plaintiff, for  
6 reporting them for cheating, stating that it's illegal, insisting that they will report the  
7 Plaintiff to get him in trouble instead, especially because they pulled an UNO, family  
8 card game, reverse card against him, while discussing how they could get paid a huge  
9 amount of money for their lawsuit against him, so Plaintiff could pay for their tuition,  
10 comforting each other not to worry because they have lawyers in their family, and are  
11 going to get each other's backs. Plaintiff's Reddit post was then taken down due to a  
12 violation, for being threatening towards the members of the University.

13        34. Plaintiff was exposed to a group of students mentioning on Discord,  
14 about cheating in Tony Rowe's physics class, so he gathered evidence, and sent an  
15 email that had photographic evidence of students cheating to Dr. Rowe, which  
16 included Defendants BECK and WATKINS, the CSU's Chancellor's Office, OEC,  
17 and DRES, explaining that students in his physics class were cheating, discussing that  
18 he's scared to report students for cheating due to his fears of being seen as a criminal  
19 for reporting injustices that occur on campus, stating in the Torah, of his Jewish  
20 religion's literature, he could only fear God, and do what's right under his  
21 commandments.

22        35. The CSU's Chancellor's Office replied back to the email letting Plaintiff  
23 know that they are in receipt of his email, and mentioned to email their CSU's  
24 Human Resources department with the evidence to investigate the issue. Plaintiff then  
25 emailed the CSU's Human Resources department and Chancellor's Office providing  
26 the photographic evidence of student academic misconduct, and faculty misconduct.

27        36. Defendant RAMIREZ immediately emailed the Plaintiff, carbon copying  
28 Defendant WATKINS, threatening the Plaintiff to stop what he's doing, for reporting



1 his grievances, explaining that it's against federal law because he's not a part of the  
2 Discord chat, which Plaintiff was a part of, and not being a part of the chat in which  
3 Plaintiff was a part of results in privacy infringement, discussing that this will result  
4 in a violation of the CSU Student Conduct Code, while placing Plaintiff's student  
5 status in jeopardy. Defendant RAMIREZ shared that the students implicated filing a  
6 complaint against him, harassing Plaintiff to not to share his complaints, about Dr.  
7 Hamer's misconduct, or it could lead to legal action against him from Dr. Hamer.

8 37. On October 8, 2022, Plaintiff out of fear for retaliation from the  
9 University, gathered the emails of attorneys, federal and state agencies, members of  
10 the University, DRES, OEC, CSU's Human Resources and Chancellor's Office,  
11 Defendants BECK and WATKINS, Kristen Walker the University's Director of the  
12 Masters of Business Administration (hereinafter "MBA") program, Chandra  
13 Subramaniam the MBA Dean, Paul Lazarony who was the MBA Associate Dean,  
14 Shelley Ruelas-Bischoff the OVP Associate Vice President, Freddie Sanchez the  
15 OVP Interim Assistant, Maria Fidaleo-Angell the OVP Administrative Analyst,  
16 Michelle Kilmnick Director for Faculty Affairs, Diane Guido Assistant Vice  
17 President for Faculty Affairs, and sent them emails with photographic evidence of  
18 Antisemitism, hate speech towards Plaintiff's Jewish religion, and other misconduct  
19 from the students and faculty at CSU, Northridge, asking for help against harassment,  
20 religious discrimination, and retaliation from the members of the University, stating  
21 his Jewish religions law.

22 38. Defendant RAMIREZ was forwarded the email that was sent on October  
23 8, 2022, and replied back to everyone listed on that email, including the Plaintiff,  
24 discussing on behalf of the University, how they take misconduct by members of the  
25 University seriously, and will proceed with investigating the matter. She stated that  
26 CSU, Northridge doesn't retaliate, to students engaging in their protected activity,  
27 explaining to the recipients that the Plaintiff is to blame for developing such concern,  
28 of his Jewish background. Defendant RAMIREZ didn't ever inform Plaintiff that he

1 was charged for the email he sent on October 8, 2022, concealing the violation until  
2 the hearing that determined his suspension, for protecting and defending his Jewish  
3 religion and community, and place of worship, which has children from harm against  
4 a CSU, Northridge student who wanted to physically harm them, determining that  
5 Plaintiff's email sent on October 8, 2022, without due process was a threat towards  
6 the members of the University.

7       39. Plaintiff, his Jewish community and its children received death threats  
8 from a student in the University who wanted to harm them in their place of worship,  
9 and immediately called the police. The police came, asked a few questions to the  
10 Plaintiff, filed a report for investigation, and left. The officers emailed Plaintiff a  
11 personalized safety plan for the Plaintiff's protection, which included information  
12 about the resources Plaintiff could use, and provided safety protocol measures to  
13 protect Plaintiff's Jewish community in their place of worship.

14       40. Plaintiff consulted with an attorney named Stanley Apps, asking if he  
15 could help Plaintiff with his situation. The attorney was provided evidence of hate  
16 speech towards Plaintiff's religion, and was told of the death threats against Plaintiff  
17 and his community, including the emails that Defendant RAMIREZ sent to him, in  
18 regard to the situation. Mr. Apps told Plaintiff that the law she's accusing Plaintiff of  
19 is false, and a form of retaliation, explaining in writing that the University may not  
20 retaliate against Plaintiff for his lawful action of reporting cheating, and how Plaintiff  
21 is not bound by the requirements of the federal law that Defendant RAMIREZ is  
22 declaring towards Plaintiff, clarifying that this cannot be a basis for discipline or  
23 other academic consequences towards him, stating that it's CSU, Northridge's  
24 obligation to stop hate speech against the Plaintiff, and to discipline the students  
25 responsible.

26       41. Plaintiff stumbled upon a group of students in the University cheating on  
27 professor Mariano Loza-Coll's biology quiz on Canvas in Discord, and went to the  
28



1 OVP to report the incident. The Plaintiff spoke to the office employee about the  
2 situation, and was told that they will document Plaintiff for his harassment.

3 42. Plaintiff wanted to spread awareness to other students in the University  
4 to follow the CSU policies, and created another post in the University's Reddit page  
5 called Academic Honesty and Misconduct Awareness, explaining how there should  
6 be more preventive measures towards students cheating, while providing useful  
7 information about what the University could do to deter cheaters, discussing how  
8 spreading awareness shouldn't result in death threats, from CSU, Northridge students  
9 intending to harm Jewish children and communities for practicing and participating in  
10 religious activities, talking about accountability, and why it's important to uphold the  
11 University's policies. Plaintiff's Reddit post was then taken down due to a violation,  
12 for being threatening towards the members of the University.

13 43. On October 18, 2022, Plaintiff sent out no emails. Defendant RAMIREZ  
14 charged Plaintiff for an email violation on October 18, 2022, for not sending any  
15 emails, stating that it was intimidating and abusive towards students and faculty.

16 44. Plaintiff had concerns that he emailed Dr. Subramaniam about, regarding  
17 his former professor Dr. Walker, towards the unfair treatment he received from Dr.  
18 Walker, and was told by him to contact her, so she can explain the situation.

19 45. Plaintiff emailed Dr. Walker regarding the situation, asking through  
20 explanation why he was subject to unfair treatment in her class. Dr. Walker didn't  
21 deny that the Plaintiff was treated more differently, and emailed Plaintiff, discussing  
22 that his issues during the time of his medical condition, which caused his lack of  
23 participation was the reason to why she treated Plaintiff more differently, explaining  
24 that regardless of Plaintiff's doctor's note for his mental condition, what she did was  
25 appropriate due to the circumstances Plaintiff was experiencing, stating her policies  
26 listed on the syllabus, don't make exceptions for medical documentation, since it's  
27 the students responsibility to prevent medical conditions that arise from their  
28 disability, not hers.

1        46. On October 28, 2022, Plaintiff emailed the United States Department of  
2 Education Office of Civil Rights (hereinafter "OCR"), and reported Dr. Walker for  
3 discrimination. Defendant RAMIREZ charged Plaintiff's email on October 28, 2022,  
4 as a violation, stating that it was intimidating and abusive towards their members, Dr.  
5 Walker.

6        47. Plaintiff emailed Dr. Subramaniam about the death threats, of the student  
7 in CSU, Northridge who wanted to physically harm the Jewish children and people of  
8 his community in their place of worship, expressing his worries and fears that he's  
9 being specifically targeted in the University, discussing that his values, for being  
10 Jewish, are being discriminated against, and how he wanted to spread awareness of  
11 educational rights and violations on the University's Reddit page, but got banned,  
12 explaining that there are other students talking about parties, illicit drugs, and  
13 disrespecting professors whose comments aren't banned, mentioning to Dr.  
14 Subramaniam that there was no consequences for those students, but his comments of  
15 spreading academic awareness gets specifically targeted and banned, instead of the  
16 students who are actually violating the University's policies. Plaintiff explained that  
17 he's scared to go into campus at night due to the fear of being harmed, discussing that  
18 he feels ill due to the situation. Plaintiff asked if Dr. Subramaniam could help him for  
19 his safety, and expressed that he just wanted to be safe. Dr. Subramaniam mentioned  
20 his thankfulness, regarding Plaintiff's serious situation, doing nothing to help or  
21 accommodate him for his duress and fear of being harmed.

22        48. Plaintiff sent out an email to Defendant WATKINS, and a carbon copy,  
23 which included Defendant BECK, Colin Donahue the University's Vice President of  
24 Administration and Finance, and Rick Evans the University's Executive Director of  
25 the University Corporation, talking about the situation regarding illegal activity  
26 happening in CSU, Northridge, and explained that he doesn't want any more death  
27 threats against him, his people, and the children, of his Jewish religious community,  
28 but was ignored.



1        49. Plaintiff under duress for his roommate's behavior sent an email, which  
2 included Defendants BECK and WATKINS, Barrett Samuel Morris the OEC  
3 Assistant Vice President, stating all the concerns and issues he was having with his  
4 roommate, including the threatening hate speech against his Jewish religion,  
5 explaining that he doesn't feel safe anymore, to participate and practice his Jewish  
6 religion. Plaintiff went to the OEC to file a discrimination report against his  
7 roommate, and an employee in the office told Plaintiff that they don't address matters  
8 involving issues with roommates, and didn't allow him to file a report towards  
9 discrimination against his Jewish religion.

10        50. Plaintiff wanted to pray, and went to grab his kippah and tefillin to find  
11 it missing. Plaintiff checked the dorm, and couldn't find it, so he filed a police report  
12 for the theft of his religious belongings.

13        51. On November 17, 2022, Plaintiff sent out emails to people in the  
14 University talking about Antisemitism, the theft of his Jewish belongings, and the  
15 threats of harm towards him and his Jewish community, including the children.

16        52. A few of the University's faculty reached out emailing the Plaintiff to  
17 help him, commending him for him trying to take action against Antisemitism, telling  
18 Plaintiff that they care about the situation, including a Jewish student who informed  
19 Plaintiff that she also has been exposed to Antisemitism by the members of the  
20 University. The University's Associated Students President and Vice President  
21 wanted to reach out to the Plaintiff about the situation regarding Antisemitism,  
22 explaining that they want students, including him, to feel safe on campus. Defendant  
23 RAMIREZ charged Plaintiff's email on November 17, 2022, as a violation for being  
24 threatening towards the members of the University, stating that it was intimidating, to  
25 protest about Antisemitism in the University.

26        53. On November 20, 2022, Plaintiff emailed the Prime Minister of Israel  
27 Benjamin Netanyahu that Antisemitism is going on in CSU, Northridge, explaining  
28 the situation he was experiencing. Defendant RAMIREZ charged Plaintiff's email on

1 November 20, 2022, as a violation for being threatening again, stating that it was  
2 intimidating, to protest the situation to Benjamin Netanyahu.

3 54. Plaintiff emailed Defendants BECK and WATKINS, the MBA  
4 department, and Dr. Walker, asking for accommodations, against the death threats,  
5 hate speech and crimes from the CSU, Northridge students, which caused significant  
6 duress to the Plaintiff. Defendant WATKINS added Julie Pearce the UCS Director to  
7 the email, and stated to reach out to their therapist Dr. Pearce, which Plaintiff did, but  
8 was ignored by Dr. Pearce.

9 55. Plaintiff sent emails that included Defendants BECK and WATKINS,  
10 Dr. Walker, and Dr. Pearce, stating that he's giving up hope from the University, for  
11 allowing Antisemitism, explaining the situation of discrimination and harassment  
12 towards his national origin, expressing the stress he's experiencing, discussing that  
13 Defendant BECK and the University doesn't want to help stop Antisemitism on  
14 campus, and don't care about his religion, asking how could Defendant BECK  
15 disregard the theft, of his kippah and tefillin, and death threats that occurred, from  
16 their student who wanted to harm and hurt the children and members of his Jewish  
17 community, including the Plaintiff.

18 56. Defendant WATKINS replied back defending the University, and its  
19 students, of their good intentions, explaining that Plaintiff should take a better  
20 approach to addressing his concerns, telling Plaintiff that his emails have no real  
21 purpose for the University to address his issues, discussing that Defendant BECK's  
22 staff, Meera Komaraju, Colin Donahue, Nichole Ipach, Ranjit Philip, Amanda  
23 Quintero, and Genevieve Evans Taylor joins him in reviewing and considering each  
24 of Plaintiff's emails, which found it appropriate to discipline Plaintiff. Defendant  
25 WATKINS said that he's willing to arrange a Zoom, video and audio communication  
26 platform, meeting with Plaintiff to discuss the matter, of his situation.

27 57. On November 24, 2022, Plaintiff sent an email to the members of the  
28 University explaining his situation of discrimination, retaliation, and Antisemitism at



1 CSU, Northridge. The University's members emailed Plaintiff discussing that he's  
2 bothering them, don't care about the situation, of Antisemitic attacks towards Jewish  
3 people, and to stop emailing them. Defendant RAMIREZ charged Plaintiff's email on  
4 November 24, 2022, as a violation for being threatening towards the members of the  
5 University, stating that it was intimidating, to protest about Antisemitic activity in  
6 CSU, Northridge.

7 58. Plaintiff called the UCS to talk about his situation, was told to contact  
8 and apologize to Defendant WATKINS, and ask him to help find Plaintiff a therapist,  
9 which Plaintiff did. Defendant WATKINS emailed Plaintiff, telling him that he will  
10 personally follow up with the UCS to observe how they plan to proceed with him,  
11 and then told Plaintiff that Marilyn Mendoza from the UCS will reach out to him.

12 59. Plaintiff sought help from Ms. Mendoza regarding the situation he was  
13 experiencing, she explained that the University just wanted the Plaintiff to stop  
14 emailing people about his problems, of their students death threats, and hate speech  
15 and crimes towards his Jewish religion, telling Plaintiff how his emails aren't threats,  
16 and wants to help him graduate without any issues. Ms. Mendoza said if the Plaintiff  
17 wants to continue going to the University, he should seek a psychiatrist accompanied  
18 with an actual psychologist to help stabilize him for his behavior.

19 60. Plaintiff emailed Defendant WATKINS if he could schedule a meeting  
20 with him, and he agreed to meet with Plaintiff on Zoom. In the meeting Plaintiff  
21 spoke about his concerns related to the emails he sent. Defendant WATKINS told  
22 Plaintiff that his emails, about hate speech and crimes against his Jewish religion, and  
23 death threats towards his Jewish community and children from being harmed through  
24 threats of violence, in regard to their Jewish identity, from their CSU, Northridge  
25 students, serve no real purpose for the University to address his situation, stating how  
26 Plaintiff could cause fear to the members of the University because he looks like a  
27 person that could be seen as a threat.  
28

1        61. Defendant RAMIREZ on behalf of the OVP sent an email to the  
2 Plaintiff, and a carbon copy, which included Defendant WATKINS, telling Plaintiff  
3 that the emails he sent on October and November 2022, were marked as a violation,  
4 stating that it was intimidating and abusive towards the members of the University,  
5 explaining that the Plaintiff is required to defend himself against the charges in a  
6 meeting scheduled with her during the date of Plaintiff's Jewish holiday.

7        62. Plaintiff went to the DRES department, scheduled a meeting with Jodi  
8 Johnson the DRES Director, talking to her about his situation. Plaintiff told her that  
9 he wanted to file a discrimination report against the University, she recommended  
10 him not to file a complaint, explaining that the University is doing this to him so he  
11 could stop sending emails, about Antisemitism, telling Plaintiff that his emails are not  
12 a threat, insisting that Plaintiff should knock it off with his emails before he gets into  
13 serious trouble, suggesting Plaintiff to use their counseling services, for his concerns  
14 about discrimination.

15        63. Plaintiff went to the UCS to schedule a meeting, and met with Seung  
16 Yoon Christina Lee a therapist. Plaintiff explained his situation to Ms. Lee, she told  
17 him that the University doesn't discriminate, and explained what Plaintiff did was  
18 wrong, to email people about their students offenses against Jewish people,  
19 recommending him to email everyone he emailed before to apologize to them.

20        64. On December 6, 2022, Plaintiff sent an email to the members of the  
21 University on behalf of Ms. Lee's recommendation, apologizing, for the emails he  
22 sent on behalf of his Jewish affiliation and origin. Jennifer Marshall a professor in the  
23 University's Communication Studies department emailed Plaintiff threatening him of  
24 his inappropriate actions, of apologizing, harassing him that she will inform Kim  
25 Jinah the University's Communication Studies Department Chair of his email, about  
26 apologizing. After the email was sent on December 6, 2022, Defendant RAMIREZ  
27 emailed Plaintiff to harass him, discussing that his behaviors are unacceptable for the  
28



1 University, stating that it would lead to a severe sanction of suspension or expulsion,  
2 to the Plaintiff.

3 65. Plaintiff would continue to try using the services of the University for  
4 help regarding his concerns of Antisemitic activity, but was told by Ms. Mendoza to  
5 stop using their crisis services for his problems, regarding Antisemitism.

6 66. Plaintiff called the UCS for an appointment, and the office scheduled a  
7 meeting with their therapist Sunil Obediah. Plaintiff informed Dr. Obediah of his  
8 situation, and told him that he can't attend the meeting with Defendant RAMIREZ  
9 due to his religious holiday, and mental state. Dr. Obediah told Plaintiff that he's in  
10 the wrong for what he did, to email people about the offenses of their students against  
11 Jewish people, telling Plaintiff not to worry about the meeting because he has a close  
12 relationship with Defendant RAMIREZ, recommending Plaintiff to call the OVP to  
13 reschedule, and meet with him again after he called them. Plaintiff then called the  
14 OVP, speaking to Ms. Ferguson about rescheduling due to private and religious  
15 reasons. Ms. Ferguson then cancelled the meeting scheduled on Plaintiff's Jewish  
16 holiday, telling him that he would be hearing back from Defendant RAMIREZ to  
17 schedule another date, for Plaintiff's due process meeting, which never happened.  
18 Plaintiff rescheduled a meeting with Dr. Obediah again, and was reassured by him  
19 that Defendant RAMIREZ will reschedule, which she didn't.

20 67. On December 15, 2022, Plaintiff sent an email to the members of the  
21 University talking about discrimination and unfairness for people of minorities  
22 against the education system, giving examples of why these things happen.

23 68. Defendant RAMIREZ sent an email in regard to Plaintiff's email on  
24 December 15, 2022, harassing Plaintiff that the email is a violation, and disciplined  
25 him without Plaintiff's right of due process by limiting his ability to participate and  
26 engage in activities that require the use of emailing, informing Plaintiff that she's  
27 personally preventing him from enrolling next semester for missing the meeting that  
28 was scheduled on his Jewish holiday, refusing to reschedule it, coercing the Plaintiff

1 to now attend a final hearing to determine whether he should be suspended or  
2 expelled, for trying to prevent Antisemitism, death threats against his Jewish  
3 community and children, as well as hate speech and crimes against Jewish people  
4 from the students in CSU, Northridge.

5 69. Defendant RAMIREZ on behalf of the OVP sent an email to the  
6 Plaintiff, which included a carbon copy to Defendant WATKINS, stating that the  
7 Plaintiff is being officially charged for the emails he sent on October and November  
8 of 2022, confirming that Plaintiff's emails were threats, based off her evaluation and  
9 investigation, towards the University members, not giving Plaintiff the ability of due  
10 process to explain himself, for protecting his Jewish religion and community. It also  
11 stated that Plaintiff is in violation for what he emailed on December 15, 2022, when  
12 he advocated for student diversity.

13 70. Defendant RAMIREZ created an resolution agreement if the Plaintiff  
14 chose to accept, discussing that if he accepts the agreement, Plaintiff would waive his  
15 right to sue the University, agrees to serve suspension, would be required to seek  
16 mental health treatment, and provide medical documentation if he wanted to enroll in  
17 the University, further explaining that Plaintiff will be placed under disciplinary  
18 probation after he serves his suspension, and would be subject to expulsion with no  
19 right to due process, which Plaintiff never received anyways, if he were to continue  
20 proceeding in the matter, of protecting his Jewish religion and community, and  
21 otherwise.

22 71. Plaintiff under significant duress sent out an email, which included  
23 Defendants BECK and WATKINS, Dr. Walker, Sheila Brown the MBA Assistant  
24 Director, Dr. Subramaniam, OEC, CSU's Chancellor's Office, quoting the United  
25 States's constitutional laws and bill of rights, and commandments of his Jewish  
26 religion, which stated not to bear false witness, to reprove wrongdoers, not to testify  
27 falsely, and for a judge to not pervert justice, under God's law.  
28



1        72. Plaintiff discussed his side of the story, since he wasn't allowed due  
2 process, explaining in detail how his emails are not threats. Defendant RAMIREZ  
3 emailed Plaintiff in regard to that email, explaining that the CSU's Chancellor's  
4 Office notified her that they are aware Plaintiff didn't receive due process. Plaintiff's  
5 University email was terminated by the University during that time, so he couldn't  
6 receive emails, send emails, and view them, which prevented him from accessing  
7 time sensitive information sent to his school email.

8        73. Plaintiff who was mentally unstable at the time due to the University's  
9 actions of charging Plaintiff for being a threat for protecting and defending his Jewish  
10 religion and community in relation to the roots of his national origin, sent an email,  
11 which included Defendants RAMIREZ and WATKINS, Dr. Walker, Dr.  
12 Subramaniam, Dr. Morris, Dr. Lazarony, Ms. Ferguson, Ms. Fidaleo-Angell, OEC,  
13 the MBA department, CSU's Chancellor's Office and Human Resources, stating that  
14 he apologizes for being Jewish, and understands why Jews are not welcome in the  
15 University. Plaintiff stated that he apologizes for the death threats against him, which  
16 included the Jewish community and children who were targeted for violence, stating  
17 that he understands why Jews are a threat to the University, and will never exercise  
18 his rights again, towards protecting and defending his Jewish religion and  
19 community, explaining that education is his life, and would do anything to continue  
20 school, begging that if the University hates Jews so much, he would convert to  
21 Christianity or Hinduism to make Defendant RAMIREZ and the University happy.

22        74. Every email Plaintiff sent to Dr. Walker and Dr. Subramaniam towards  
23 his serious situation was ignored, including the death threats against Plaintiff, and his  
24 Jewish community, choosing not to accommodate Plaintiff for his fears, worries, and  
25 stress from the members of the University, which caused harm to the Plaintiff,  
26 negatively impacting his participation and experience in the MBA program at CSU,  
27 Northridge, showing blatant disregard of Plaintiff's safety, disregarding any effort to  
28 engage in mitigating Plaintiff's issues for the harm caused against Plaintiff that had a

1 rippling effect on his wellbeing and mental health, causing Plaintiff to have  
2 significant irreparable trauma.

3       75. The University allowed the Plaintiff to register for his courses, so he  
4 enrolled. As Plaintiff began class his professor Thomas Wedel lecturer of the MBA  
5 Systems and Operations Management course would bring up examples of Plaintiff's  
6 situation, stating how cases revolving plaintiffs and defendants can be deadly, if  
7 Plaintiff sued them, teaching content of lawsuits, testimonies, prisons, while making  
8 statements about convicting an innocent person, lying, and deceiving your audience  
9 through the use of mathematics, explaining in reference through statements and  
10 content how Plaintiff's lawsuit case would get a motion to dismiss from the  
11 University, as well as a reverse judgement against him for his lawsuit case, in a math  
12 course that's supposed to be teaching supply chain management, purchasing and  
13 inventory, planning, and scheduling.

14       76. Dr. Wedel had inappropriate, abusive and offensive math questions,  
15 which included inappropriate terms and phrases, as well as video and audio  
16 recordings of all his lectures, which he shared online to the students, including the  
17 Plaintiff to download.

18       77. Dr. Wedel asked Plaintiff if he could drive him to his car after class to  
19 the University parking lot, so he did. During the time in which Plaintiff was driving  
20 Dr. Wedel to his car, Dr. Wedel sexually touched him, and let Plaintiff know that if  
21 he wanted help in his class, he could meet with him in his office hours.

22       78. Plaintiff sought help from his attorney Mr. Apps, showing him  
23 documents of the emails he was charged with that were considered threats to the  
24 University. Mr. Apps told Plaintiff that none of the emails he was charged with were  
25 considered threatening, abusive, or offensive, informing Plaintiff in writing that he  
26 would file a lawsuit against the University to prevent the hearing from proceeding.

27       79. Eventually Mr. Apps didn't prevent the hearing from proceeding, telling  
28 Plaintiff that he's not going to sue the University, deceiving Plaintiff's case, and



1 ignored him, working on behalf of the benefit of the CSU rather than the Plaintiff for  
2 defending his ancestry roots of Israel. Plaintiff spoke to Mr. Apps about the situation  
3 regarding the students who he reported for cheating in Dr. Hamer's course, and was  
4 told by Mr. Apps that the students were allowed to cheat on their exams, however  
5 Plaintiff stated otherwise.

6 80. Defendants RAMIREZ and WATKINS, Ms. Monaco, and Ms. Fidaleo-  
7 Angell was informed in writing by Plaintiff's attorney that Plaintiff couldn't attend  
8 the hearing due to his mental state and condition to engage in the meeting. The  
9 hearing still continued on June 15, 2023, by a student conduct administrator, and  
10 Juana Maria Valdivia who was the University's Hearing Officer. Plaintiff was  
11 informed by Defendant WATKINS that in regard to the hearing which took place, it  
12 was mentioned that Plaintiff was charged for the emails he was in violation for on  
13 October and November of 2022, for defending and protecting his Jewish religion and  
14 community, since it was threatening to the members of the University. It was stated  
15 that Plaintiff should be suspended, be put on disciplinary probation, seek medical  
16 treatment, and provide medical documentation if he wants to be allowed in the  
17 University, disregarding Plaintiff's medical documentation that was already provided  
18 to CSU, Northridge, leaving no option for the Plaintiff to protect himself from the  
19 members of the University who instill harm to his Jewish religion and community.  
20 The report stated that they took Plaintiff's previous disciplinary probation into  
21 consideration, when he utilized the UCS to talk to a therapist about having thoughts  
22 of retaliating, as a form of self-defense to prevent him from being harmed, against a  
23 student in CSU, Northridge, who caused physical harm towards Plaintiff on campus.

24 81. On August 11, 2023, Defendant WATKINS sent Plaintiff a letter from  
25 the OVP to inform him that in regard to the hearing that took place on June 15, 2023,  
26 Defendant WATKINS decided to officially suspended Plaintiff, while putting him on  
27 disciplinary probation until he completes his degree, explaining that the conduct  
28

1 Plaintiff did regarding the emails that he was in violation for, towards defending his  
2 Jewish religion and community, resulted in his decision to suspend him.

3 82. Plaintiff spoke to Ms. Fidaleo-Angell regarding the matter, she  
4 mentioned that Plaintiff's emails were unnecessary, to protect his Jewish religion and  
5 community, telling Plaintiff to take a break from the situation since she understands  
6 what he's mentally going through.

7 83. To exhaust all administrative measures Plaintiff sent complaint forms  
8 through certified mail on November 20, 2023, with documentation that included the  
9 University's discrimination, harassment, and retaliation towards him to CSU,  
10 Northridge, the OCR, the United States Department of Justice Civil Rights Division  
11 (hereinafter "DOJ"), which were all received on or before November 24, 2023.

12 84. Plaintiff sent a notice of claim through certified mail to Ms. Monaco on  
13 November 20, 2023, which was received on November 22, 2023, to inform her and  
14 the CSU on notice and existence of Plaintiff's discrimination claims against CSU,  
15 Northridge, and his intent to file a lawsuit against them, stating that this is a condition  
16 that is supposedly needed to be met to bring a lawsuit in the near future.

17 85. Plaintiff in compliance with the Government Tort Claims Act, sent the  
18 claim form through certified mail on November 20, 2023, which was received on  
19 November 21, 2023, to the CSU Office of the Chancellor, to their Systemwide Risk  
20 Management department with documentation that included the University's  
21 discrimination, harassment, and retaliation. The CSU didn't respond after 45 days of  
22 receiving the government claim form, which was deemed rejected under Cal. Gov.  
23 Code § 912.4.

24 86. In the documentation and government claim form, which had evidence  
25 of discrimination that was sent through certified mail, it discussed in good faith that  
26 the Plaintiff wants to give the OCR, DOJ, and CSU, Northridge a fair opportunity to  
27 review his report against discrimination, harassment, and retaliation against the  
28 University in an unbiased manner. Plaintiff included approximately 100 pages worth



1 of information and evidence that showed the University's conduct against him, which  
2 included violations such as abuse of power, breach of contract, falsification, fraud,  
3 misrepresentation of factual evidence, and other illegal activities initiated against the  
4 Plaintiff to specifically target him.

5 87. CSU, Northridge acknowledged Plaintiff's complaint, and scheduled a  
6 virtual meeting with Aimee May the OEC Investigator of discrimination, harassment,  
7 and retaliation. The investigator told Plaintiff that they will not take the case because  
8 nothing in his complaint showed any type of discrimination, harassment, or  
9 retaliation from the University, which excluded him from participating in the  
10 University's procedures of conducting a review of evidence between the Plaintiff, and  
11 CSU, Northridge. It was mentioned by Ms. May that Plaintiffs other reports to the  
12 OCR and DOJ will be rejected too.

13 88. The DOJ acknowledged Plaintiff's complaint, and on November 28,  
14 2023, informed Plaintiff that his case could have merit for a lawsuit, giving him  
15 additional information for the legal process. The OCR acknowledged Plaintiff's  
16 complaint, but didn't proceed any further in assisting Plaintiff, leaving him with no  
17 more options of utilizing administrative and exhaustive measures, but to proceed the  
18 dispute in court.

### 19 **FIRST CAUSE OF ACTION**

#### 20 **Violation of Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d et seq.**

21 89. Plaintiff repeats and realleges each of the allegations in the complaint.

22 90. Defendants CSU and BECK allowed Defendants RAMIREZ,  
23 WATKINS, and the employees of Defendant CSU to engage in retaliatory and  
24 discriminatory conduct against the Plaintiff for reporting students who were cheating,  
25 reporting their faculties misconduct, participating in religious activities, rightfully  
26 protesting against Antisemitism, and for reporting a faculty member to the OCR, by  
27 harassing, threatening, disciplining, and punishing Plaintiff through charges of  
28

1 violation, suspension, and probation in an attempt to prevent Plaintiff from ever  
2 engaging in the participation of his protected activities.

3 91. The conduct Plaintiff was exposed to due to Defendant CSU's  
4 employees retaliation were constant threats to suspend and expel him from CSU,  
5 Northridge, marking him as a high-level threat, terminating and interfering with  
6 Plaintiff's school email to exclude him from sending and viewing emails, which  
7 prevented him from receiving important emails that were time sensitive, intimidating  
8 Plaintiff in a conspiracy to obstruct justice and harm him if a lawsuit were to happen  
9 against them, and threatening to call the police if he participated and engaged in the  
10 use of their services.

11 92. Defendant RAMIREZ failed to adequately investigate Plaintiff's report  
12 of cheating by conducting a flawed and inadequate investigation into Plaintiff's  
13 claims, relieving the students from discipline for being caught from cheating, treating  
14 them more favorably than the Plaintiff who was treated differently, coercing Plaintiff  
15 to accept that the photographic evidence he sent with proof of the CSU, Northridge  
16 students cheating were reports of allegations without proof, while personally  
17 retaliating against Plaintiff through threats of severe punishment and violation for  
18 participating in his protected activities, allowing the students to engage in academic  
19 dishonesty, refusing to discipline them by disciplining Plaintiff instead as a form of  
20 retaliation for following the policies of reporting academic misconduct, excluding  
21 and ignoring Plaintiff's facts and information, harassing him for trying to enforce  
22 academic dishonesty, deeming that the Plaintiff is the problem for having such  
23 concern for the CSU's Student Conduct Code's rather than supporting him for  
24 following the University's policies that encourages students to report cheating.

25 93. Defendant CSU's employees had the ability to monitor user information  
26 to detect cheating, but chose not to, allowing the students to safely engage in  
27 academic misconduct, while harassing Plaintiff for having photographic evidence of  
28 students cheating by threatening expulsion, suspension, and legal trouble against him,



1 coercing Plaintiff to leave their premises when he engaged in the use of their services  
2 by force or they would call the police to file a disturbance report against him,  
3 subjugating him through retaliatory conduct through the use of intimidation and fear.

4 94. No further steps were taken to alleviate Plaintiff's other claims of  
5 students cheating when informed to the employees of Defendant CSU, who were  
6 denying and excluding Plaintiff from filing reports of misconduct that occurred on  
7 CSU, Northridge, retaliating against him through the use of threats that they would  
8 charge him for harassment if he continues to participate in his protected activity.

9 95. Defendant CSU allowed its employees to exclude, prevent, and deny  
10 Plaintiff from filing reports of discrimination, harassment, and retaliation, refusing to  
11 open an investigation upon notice of Plaintiff's claims that had clear evidence beyond  
12 a reasonable doubt that there was misconduct being conducted from their members,  
13 and retaliated against the Plaintiff through threats of legal action for trying to seek  
14 enforcement of the CSU Student Conduct Code's.

15 96. Defendants CSU, BECK, and WATKINS allowed Defendants  
16 RAMIREZ to wrongfully charge Plaintiff for the emails he sent on October 8, 2022,  
17 which was when he asked for help against harassment, religious discrimination, and  
18 retaliation from the University, showing photographic evidence of the students hate  
19 speech who targeted Plaintiff's religion, October 18, 2022, for not sending an email,  
20 October 28, 2022, for reporting a faculty member to the OCR, November 17, 2022,  
21 for talking about Antisemitism, the theft of his Jewish belongings used to show his  
22 appreciation for God, the kippah and tefillin, and the death threats against him and his  
23 Jewish community, November 20, 2022, for emailing the Prime Minister of Israel  
24 Benjamin Netanyahu that Antisemitism is going on in CSU, Northridge, November  
25 24, 2022, for sending out emails to the members of the University, explaining his  
26 situation of discrimination, retaliation, and Antisemitism in the University, December  
27 6, 2022, for sending an email on behalf of their employee's instructions to apologize  
28 to members of the University, for emailing them about his concerns related to

1 Antisemitism, discrimination, and retaliation in the University, December 15, 2022,  
2 for sending an email to the University talking about discrimination and unfairness for  
3 the people of minorities, which are clear indicators beyond a reasonable doubt that  
4 the Plaintiff was specifically targeted, retaliated, and discriminated against based off  
5 his race, color, and national origin.

6 97. Defendant WATKINS made bias statements with prejudice against  
7 Plaintiff's perceived status by the implication that his appearance is a threat,  
8 subjugating Plaintiff under discrimination for his genetic heredities of his race, color,  
9 and national origin.

10 98. Defendant RAMIREZ denied rescheduling Plaintiff's due process  
11 meeting upon notice, intentionally scheduling the meeting on Plaintiff's Jewish  
12 holiday, with a conscious disregard of preventing Plaintiff from participating and  
13 practicing his religion, knowingly aware that Plaintiff couldn't attend the meeting due  
14 to religious reasons, and ignored the cancellation to reschedule the due process  
15 meeting in another day that does not correspond with his religious practices,  
16 specifically targeting Plaintiff for his perceived status.

17 99. Defendant CSU's employees excluded, prevented, and deprived Plaintiff  
18 from filing a discrimination report against his roommates discriminatory conduct,  
19 which involved harassing Plaintiff for being Jewish, creating a hostile environment  
20 which he didn't feel safe in, and allowed Plaintiff's roommates to engage in  
21 discriminatory conduct to specifically target him for his perceived status.

22 100. Defendant CSU allowed its employees to specifically target the Plaintiff  
23 from his right to participate and engage in their Reddit page, banning his comments  
24 as a form of retaliation for encouraging students to follow the CSU policies and  
25 maintain academic integrity, while allowing their students to post content and  
26 comments that are unlawful, unethical or a violation to the CSU policies, including  
27 offensive and abusive language on their public forums.

28



1           101. Defendants CSU and BECK allowed its employees to discriminate  
2 Plaintiff from exercising his religious laws and beliefs by retaliating against him for  
3 his protected activity of honoring God's commandments, allowing its students to  
4 conduct hate speech, racial slurs, and Antisemitic rhetoric against his religion to  
5 specifically target Plaintiff for his perceived status of being Jewish, while disciplining  
6 Plaintiff through student conduct charges for bringing up Antisemitism, the theft of  
7 his religious items the kippah and tefillin, and the death threats against him, his  
8 community, and the children of his place of prayer and worship.

9           102. Defendant CSU allowed its employees to use class resources to talk  
10 about what would happen if the Plaintiff were to conduct a lawsuit by showing  
11 Plaintiff what they can do to prevent a lawsuit, how cases revolving plaintiffs and  
12 defendants can be deadly, inferring the intent to cause severe harm towards Plaintiff,  
13 including content that teaches how to convict an innocent person, commit perjury,  
14 and deceive your audience through the use of mathematics, while explaining how  
15 Plaintiff's lawsuit case would get a motion to dismiss, including an amended reverse  
16 judgement to the Defendants in that case, giving math questions about prisons,  
17 testimonies, and lawsuits in an system and operations management mathematics  
18 course that teaches supply chain management, purchasing and inventory, planning,  
19 and scheduling.

20           103. Defendants CSU, BECK, RAMIREZ, WATKINS, and Defendant CSU's  
21 employees actions were willful, intentional, malicious, oppressive, and despicable,  
22 acting with willful and conscious disregard for Plaintiffs protected activity, perceived  
23 status, and rights by subjugating him through discriminatory and retaliatory conduct  
24 to prevent him from the engagement and participation of their services, as well as  
25 Plaintiff's protected rights.

26           104. Defendants CSU, BECK, RAMIREZ, WATKINS, and Defendant CSU's  
27 employees have contractual and obligational duties to report discrimination,  
28 harassment, and retaliation, making the clear concise decision of allowing its

1 employees to engage in retaliatory conduct towards Plaintiff to specifically target him  
2 by giving him unfair, unequal, and uncivil treatments and punishments for engaging  
3 in his protected activity, knowing that the Plaintiff was fundamentally exercising his  
4 rights, retaliating against him for defending his national origin, while allowing their  
5 students to engage in hate speech and discriminatory conduct towards his religion  
6 with no consequences or punishments.

7 105. Defendant CSU, BECK, RAMIREZ, WATKINS, and Defendant CSU's  
8 employees have an obligation to stop hate speech, racial slurs, or any discriminatory  
9 rhetoric, but made the conscious decision to allow this conduct to occur towards the  
10 Plaintiff, subjugating him through discrimination, and segregating him from his  
11 protected activity of exercising his religion, while creating a hostile environment,  
12 which he didn't feel safe in due to the conduct that specifically targeted his perceived  
13 religious status, disregarding any attempts to assist the Plaintiff from the attacks  
14 against his Jewish religion, and disciplined him instead.

## 15 SECOND CAUSE OF ACTION

### 16 Violation of Section 504 of the Rehabilitation Act of 1973, 29 U.S.C. § 794 et seq.

17 106. Plaintiff repeats and realleges each of the allegations in the complaint.

18 107. Defendants RAMIREZ, WATKINS, and Defendant CSU's employees  
19 were consciously aware that Plaintiff has a disability, and couldn't attend the hearing  
20 due to his mental state, proceeding to continue with the hearing anyways without  
21 further accommodating Plaintiff's capacity to participate, subjugating Plaintiff  
22 through disability discrimination from unfair, uncivilized, and unequal treatment in  
23 regard to his protected status.

24 108. Defendant CSU's employees retaliated against Plaintiff based upon his  
25 mental condition, by taking advantage of that fact that he has a disability, disengaging  
26 his worries and fears through manipulative practices to trick Plaintiff into believing  
27 that he's the problem, recommending him to be stabilized for having concerns that  
28 attacked his perceived status, which was exacerbated by the members of the



University, telling him that he needs to seek a psychiatrist for the purpose of being medicated, in regard to his fears and worries from harassment, discrimination, and hostile behavior towards his national origin, subjugating Plaintiff through disability discrimination by stereotyping his protected status, inferring that the problem associated with their students Antisemitic conduct as well as their own discriminatory conduct are medical concerns that should be addressed by a mental health professional, retaliating against the Plaintiff that medical treatment revolving medication is the solution for discriminatory conduct that occurs at CSU, Northridge, while insisting that it's a requirement for Plaintiff to receive medical care, if he wants to be allowed to enroll in the University, since his behaviors caused by his mental condition was not assessed properly, which segregated Plaintiff for unfair, unequal, and uncivil treatment based upon his disability.

109. Defendant CSU's employees intentionally discriminated against Plaintiff's mental condition, which prevented him from participating in class, treating him unfairly, unequally, and inhumanely than other students in the University, refusing to accommodate him properly, after being provided with medical documentation of his mental state and condition.

### **PRAYER FOR RELIEF**

WHEREFORE, Plaintiff respectfully request that this Court order the following relief:

1. An injunction preliminarily and permanently requiring Defendants to remove any records of Plaintiff's suspension and probation.

2. An injunction preliminarily and permanently requiring Defendants to enforce their nondiscrimination policies, ensuring that Jewish members in the CSU community are protected with respect to their Jewish identities, including their physical safety and otherwise.

3. An injunction preliminarily and permanently mandating that Defendants take action by combating Antisemitism within the CSU by communicating to the

1 entire 23 CSU campuses via broadcast email or similar that the CSU's will properly  
2 and truthfully investigate, condemn, and punish any conduct that harasses members  
3 of the Jewish community, or others on the basis of their ethnic or ancestral  
4 background without retaliation, and initiate mandatory educative training of  
5 Antisemitism to all their employees.

6 4. An injunction preliminary and permanently mandating that Defendants  
7 allow students who are subject to disciplinary action the right to video and audio  
8 record their meetings in all 23 CSU campuses, and to allow those students to use it  
9 for evidence wherever required, especially in court.

10 5. An injunction preliminary and permanently mandating Defendants to  
11 allow attorneys or others the right to defend and speak for students who are subject to  
12 disciplinary action in all 23 CSU campuses.

13 6. An injunction preliminary and permanently mandating Defendants to  
14 require persons with mental conditions or disabilities who are subject to disciplinary  
15 action a proper determination meeting in all 23 CSU campuses that includes a  
16 psychologist, psychiatrist, and medical professional input, allowing any evidence  
17 from persons medical history to be reviewed, and be required to video and audio  
18 record the determination meetings in all 23 CSU campuses, giving each persons a  
19 copy of the recordings, allowing it to be used for evidence wherever required,  
20 especially in court.

21 7. An injunction preliminary and permanently mandating that Defendants  
22 provide resources on how to sue a state university to all their students in the 23 CSU  
23 campuses, showing the correct procedural steps before filing a lawsuit, for the sole  
24 purpose of preventing Defendants from freely engaging in discriminatory conduct  
25 and otherwise.

26 8. Any other relief which this Court may deem just and proper.

27 **DEMAND FOR JURY TRIAL**

28 Plaintiff demands a jury trial on all issues so triable.



DATED: May 2, 2024

Signature: Edwin Nahavandi

Plaintiff in Pro Per

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28